

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

RODOLFO CHAPA

VS.

JANE DOE AND
WAL-MART STORES, INC.; WAL-
MART STORES TEXAS, LP; AND
WAL-MART STORES TEXAS, LLP

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C.A. NO. 19-cv-84

JURY DEMANDED

NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. § 1441

TO THE CLERK OF THE ABOVE ENTITLED COURT:

Please take notice that Defendants, Wal-Mart Stores, Inc., Wal-Mart Stores Texas, LP and Wal-Mart Stores Texas, LLP, hereby remove to the Court the state action described below.

1. On December 20, 2018, a civil action was commenced, in the 57th Judicial District Court of Bexar County, Texas, entitled *Rodolfo Chapa v. Jane Doe and Wal-Mart Stores, Inc., Wal-Mart Stores Texas, LP and Wal-Mart Stores Texas, LLP*, Cause No. 2018CI23837. A copy of Plaintiff's Original Petition is attached hereto as **Exhibit A**.

2. Service of summons and complaint was made on Defendant, Wal-Mart Stores Texas, LLC by certified mail on January 4, 2019. Defendant, Wal-Mart Stores Texas, LLC first received a copy of said Petition on January 8, 2019. A copy of the Citation is attached hereto as **Exhibit B**.

3. Defendant, Wal-Mart Stores Texas, LLC has filed an Original Answer, which is attached as **Exhibit C**, a Demand for Jury Trial, which is attached as **Exhibit D** and a Notice of Filing of Removal to Federal Court, attached as **Exhibit E**. Defendant, Wal-Mart Stores Texas, LLC has attached all process, pleadings, and orders in the State Court action as required by 28 U.S.C. 1446(a).

JURISDICTION AND VENUE

4. The action is a civil action of which this Court has original jurisdiction under Title 28 U.S.C. § 1332 (Diversity Jurisdiction), and is one which may be removed to this Court pursuant to Title 28 U.S.C. § 1441. There is complete diversity of citizenship amongst the parties. Defendant, Wal-Mart Stores Texas, LLC is a limited liability company formed under the laws of Delaware, with its principal place of business in Arkansas. The sole member of Wal-Mart Stores Texas, LLC is Wal-Mart Real Estate Business Trust. Wal-Mart Real Estate Business Trust is a Delaware statutory trust with its principal place of business in Arkansas. The sole unit holder of Wal-Mart Real Estate Business Trust is Wal-Mart Property Co. which is a wholly owned subsidiary of Wal-Mart Stores East, LP. Wal-Mart Property Co. is a corporation formed under the laws of the State of Delaware with its principal place of business in the State of Arkansas. Wal-Mart Stores East, LP is a Delaware limited partnership, of which WSE Management, LLC is the general partner, and WSE Investment, LLC is the limited partner. WSE Management, LLC is a Delaware limited liability company, and has its principal place in Bentonville, Arkansas. WSE Investment, LLC is a Delaware limited liability company, and has its principal place in Bentonville, Arkansas. The sole member of WSE Management, LLC and WSE Investment, LLC is Wal-Mart Stores East, LLC. (f/k/a Wal-Mart Stores East, Inc.), whose parent company is Walmart Inc. (f/k/a Wal-Mart Stores, Inc.). Wal-Mart Stores East, LLC is a limited liability company formed under the laws of the State of Arkansas, and has its principal place of business in the State of Arkansas. The sole member of Wal-Mart Stores East, LLC is Walmart Inc. (f/k/a Wal-Mart Stores, Inc.). Plaintiff is a Texas citizen, with his residence in Bexar County, Texas.

5. As to Jane Doe, pursuant to 28 U.S.C. § 1441 (b)(1) in determining whether a civil action is removable on the basis of the jurisdiction under section 1332(a) of this title, the citizenship of defendants sued under fictitious names shall be disregarded.

6. The amount in controversy exceeds the sum of Seventy-five Thousand Dollars

(\$75,000.00), exclusive of interest and costs. *See page 6 of Plaintiff's Original Petition.*

7. Venue is proper in the Western District of Texas, San Antonio Division because this District and Division embrace the place in which the action is pending.

Dated: January 20, 2019

Respectfully submitted,

Daw & Ray
A Limited Liability Partnership

/s/ Willie Ben Daw, III

Willie Ben Daw, III; TBN: 05594050

Email: wbdaw@dawray.com

James K. Floyd; TBN: 24047626

Email: jfloyd@dawray.com

14100 San Pedro Ave., Suite 302

San Antonio, Texas 78232

(210) 224-3121 Telephone

(210) 224-3188 Facsimile

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the above and foregoing instrument has been served upon all known counsel of record by Electronic Service on the 30th day of January, 2019.

Raul B. Rodriguez
RAUL B. RODRIGUEZ LAW, P.C.
540 S. St. Mary's Street
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Shawn C. Brown
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Email: shawn@shawnbrownlaw.com

/s/ Willie Ben Daw, III
Willie Ben Daw, III

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

RODOLFO CHAPA

VS.

JANE DOE AND
WAL-MART STORES, INC.; WAL-
MART STORES TEXAS, LP; AND
WAL-MART STORES TEXAS, LLP

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C.A. NO. _____

JURY DEMANDED

INDEX OF DOCUMENTS FILED WITH REMOVAL ACTION

- (A) Plaintiff's Original Petition
- (B) Citation
- (C) Defendant Wal-Mart Stores Texas, LLC's Original Answer
- (D) Defendant's Demand for Jury Trial
- (E) Notice of Filing of Removal to Federal Court
- (F) List of Counsel of Record

EXHIBIT “A”

4. Defendant, WAL-MART STORES INC., is a corporation organized under

the laws of the State of Arkansas and doing business with the State of Texas. This entity may be served with process herein by serving its registered agent at the following address: CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3136 and The Corporation Company, 124 West Capitol Avenue, Suite 1900, Little Rock, AR 72201, or wherever he or she may be found.

5. Defendant, WAL-MART STORES TEXAS, LP, is a business entity existing under the laws of the State of Texas. This entity may be served with process herein by serving its registered agent at the following address: CT Corporation System, 350 North St. Paul St., Dallas, TX 75201, or wherever he or she may be found.

6. Defendant, WAL-MART STORES TEXAS, LLC, is a business entity existing under the laws of the State of Texas. This entity may be served with process herein by serving its registered agent at the following address: CT Corporation System, 350 North St. Paul St., Dallas, TX 75201, or wherever he or she may be found.

7. Pursuant to Rule 28 of the Texas Rules of Civil Procedure, Plaintiff hereby gives Defendants notice that they are being sued in all of its business or common names regardless of whether such businesses are partnerships, unincorporated associations, limited liability companies, individuals, entities, and or private corporations.

JURISDICTION AND VENUE

8. Venue is proper as to Bexar County, as all of the events and/or omissions giving rise to the underlying claim occurred in Bexar County, Texas.

FACTS

9. At all times material hereto, and specifically on January 6, 2017 the

Defendant WAL-MART STORES, INC.; WAL-MART STORES TEXAS, LP; AND/OR WAL-MART STORES TEXAS, LLP was the registered owner of the premises located at 1603 Vance Jackson Road, San Antonio, Texas 78213 and the entity that operated the establishment where the incident made the basis of this suit occurred.

10. On January 6, 2017, RODOLFO CHAPA entered upon said premises at the invitation of Defendants as a paying patron at the Defendants' business establishment. RODOLFO CHAPA was walking towards the entrance of the store when JANE DOE approached RODOLFO CHAPA to ask for money. RODOLFO CHAPA declined and JANE DOE kicked RODOLFO CHAPA'S right knee thereby causing his injuries.

11. During the time that RODOLFO CHAPA was upon and/or in Defendants' property, RODOLFO CHAPA was seriously injured by the Defendant, Jane Doe, another patron, who committed serious bodily assault upon him.

12. RODOLFO CHAPA'S bodily injuries occurred as a direct result of Defendants' negligence in safe guarding the premises and lack of providing adequate security which resulted in the other patron's assault on RODOLFO CHAPA in and on the Defendants' premises. The Defendants knew or should have known of the dangerous activities and conditions in their business operation that existed on January 6, 2017. The Defendants' WAL-MART STORES, INC.; WAL-MART STORES TEXAS, LP; AND/OR WAL-MART STORES TEXAS, LLP owed a duty to protect RODOLFO CHAPA as the risk criminal conduct was unreasonable and foreseeable.

**RODOLFO CHAPA'S CLAIM OF NEGLIGENCE
AGAINST WAL-MART STORES, INC.; WAL-MART STORES TEXAS, LP;
AND/OR WAL-MART STORES TEXAS, LLP**

13. Defendant **WAL-MART STORES, INC.; WAL-MART STORES TEXAS, LP; AND/OR WAL-MART STORES TEXAS, LLP** had a duty to exercise the degree of care that a reasonably careful person would use to avoid harm to others under circumstances similar to those described herein.

14. Plaintiff's injuries were proximately caused by Defendant **WAL-MART STORES, INC.; WAL-MART STORES TEXAS, LP; AND/OR WAL-MART STORES TEXAS, LLP** negligent, careless and reckless disregard of said duty.

15. The negligent, careless and reckless disregard of duty of Defendant **WAL-MART STORES, INC.; WAL-MART STORES TEXAS, LP; AND/OR WAL-MART STORES TEXAS, LLP** consisted of, but is not limited to, the following acts and omissions:

- A. In that Defendants **WAL-MART STORES, INC.; WAL-MART STORES TEXAS, LP; AND/OR WAL-MART STORES TEXAS, LLP** failed to provide a safe establishment for the Plaintiff's safety that would have been maintained by a person of ordinary prudence under the same or similar circumstances;
- B. In that Defendants **WAL-MART STORES, INC.; WAL-MART STORES TEXAS, LP; AND/OR WAL-MART STORES TEXAS, LLP** failed to protect RODOLFO CHAPA from unreasonable risks of harm or to warn him of the risks so that he may avoid them;
- C. In that Defendants **WAL-MART STORES, INC.; WAL-MART STORES TEXAS, LP; AND/OR WAL-MART STORES TEXAS, LLP** failed exercise proper hiring and training of their employees that would have prevented the assault to Plaintiff;
- D. In that Defendants **WAL-MART STORES, INC.; WAL-MART STORES TEXAS, LP; AND/OR WAL-MART STORES TEXAS, LLP** failed to ensure the safety of their patrons despite having knowledge of continued dangerous activity and dangerous conditions;
- E. In that Defendants **WAL-MART STORES, INC.; WAL-MART STORES**

TEXAS, LP; AND/OR WAL-MART STORES TEXAS, LLP failed to warn about or make safe the premises from the violent and criminal activity they knew of and that was on a continuous basis;

- F. In that Defendant WAL-MART STORES, INC.; WAL-MART STORES TEXAS, LP; AND/OR WAL-MART STORES TEXAS, LLP failed to provide adequate security and/or law enforcement;
- G. In that Defendants WAL-MART STORES, INC.; WAL-MART STORES TEXAS, LP; AND/OR WAL-MART STORES TEXAS, LLP failed keep safe and warn from the foreseeable criminal activity that was taking place on their premises.

**RODOLFO CHAPA'S CLAIM OF NEGLIGENCE
AGAINST JANE DOE**

16. Defendant JANE DOE, physically attacked Plaintiff by forcefully kicking his right knee and attacking him, thus causing him bodily harm.

DAMAGES FOR PLAINTIFF, RUDOLFO CHAPA

17. As a direct and proximate result of the occurrence made the basis of this lawsuit, Plaintiff, RODOLFO CHAPA, was caused to suffer serious bodily injuries and to incur the following damages:

- A. Reasonable medical care and expenses in the past;
- B. Reasonable and necessary medical care and expenses which will in all reasonable probability be incurred in the future;
- C. Physical pain and suffering in the past;
- D. Physical pain and suffering in the future;
- E. Physical impairment in the past;
- F. Physical impairment which, in all reasonable probability, will be suffered in the future;
- G. Loss of earnings in the past;

- H. Loss of earning capacity which will, in all probability, be incurred in the future;
- I. Disfigurement in the past;
- J. Disfigurement in the future;
- K. Mental anguish in the past; and
- L. Mental anguish in the future.

PRAYER

Because of all of the above and foregoing, Plaintiff has been damaged, and will be damaged, in a sum within the jurisdictional limits of this Court. Such monetary relief is to be in an amount deemed to be just and fair by a jury of Plaintiff's peers and is to be over \$200,000.00 but not more than \$1,000,000.00.

WHEREFORE, PREMISES CONSIDERED, Plaintiff, RODOLFO CHAPA, respectfully prays that the Defendants be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Plaintiff against Defendants for damages in an amount within the jurisdictional limits of the Court; together with pre-judgment interest at the maximum rate allowed by law; post-judgment interest at the legal rate, costs of court; and such other and further relief to which the Plaintiff may be entitled at law or in equity.

Respectfully submitted by,

RAUL B. RODRIGUEZ LAW, P.C.
540 S. St. Mary's Street
San Antonio, Texas 78205
(210) 272-7269; Telephone
(210) 224-8214; Facsimile

BY: /s/ Raul B. Rodriguez

RAUL B. RODRIGUEZ

State Bar No. 24049475

Raul@rodriguezlawtx.com

ATTORNEYS FOR PLAINTIFF

AND

THE LAW OFFICE OF SHAWN C. BROWN

540 S. St. Mary's Street

San Antonio, Texas 78205

(210) 224-8200; Telephone

(210) 224-8214; Facsimile

BY: /s/ Shawn C. Brown

SHAWN C. BROWN

State Bar No. 24003613

shawn@shawnbrownlaw.com

ATTORNEYS FOR PLAINTIFF

PLAINTIFF RESPECTFULLY REQUESTS A JURY TRIAL

EXHIBIT “B”



**Service of Process
Transmittal**

01/02/2019

CT Log Number 534664688

TO: Kim Lundy Service of Process, Legal Support Supervisor
Walmart Inc.
702 SW 8th St, MS#0215
Bentonville, AR 72716-6209

RE: Process Served in Arkansas

FOR: Wal-Mart Stores, Inc. (Former Name) (Domestic State: DE)
Walmart Inc. (True Name)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Chapa Rodolfo, Pltff. vs. Jane Doe, et al., Dfts. // To: Wal-Mart Stores Inc

DOCUMENT(S) SERVED: Citation, Petition, Trial

COURT/AGENCY: 57th Bexar County-District County, TX
Case # 2018CI23837

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition - 01/06/2017 -
1603 Vance Jackson Road, San Antonio, Texas 78213

ON WHOM PROCESS WAS SERVED: CT Corporation System, Little Rock, AR

DATE AND HOUR OF SERVICE: By Certified Mail on 01/02/2019 postmarked on 12/27/2018

JURISDICTION SERVED : Arkansas

APPEARANCE OR ANSWER DUE: Within 20 days from the date of service

ATTORNEY(S) / SENDER(S): Shawn C Brown
The Law Office of Shawn C Brown
540 S Saint Marys St
San Antonio, TX 78205-3418
210-272-7269

ACTION ITEMS: CT has retained the current log, Retain Date: 01/02/2019, Expected Purge Date:
01/07/2019

Image SOP

Email Notification, Kim Lundy Service of Process ctlawsuits@walmartlegal.com

SIGNED: CT Corporation System
ADDRESS: 124 West Capitol Avenue
Suite 1900
Little Rock, AR 72201-3736
TELEPHONE: 214-932-3601



onna Kay McKinney
exar County District Clerk
11 W. Nueva, Suite 217
AN ANTONIO, TEXAS 78205

ETURN SERVICE REQUESTED

CERTIFIED MAIL®



7018 0360 0000 5267 6083

WAL-MART STORES INC
C/O CT CORPORATION SYSTEM
124 WEST CAPITOL AVENUE 1900
LITTLE ROCK, AR 72201

20180122007 12/20/2018 03:04 00000000000000000000

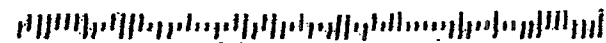


U.S. POSTAGE >> PITNEY BOWES



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7220133717 C072



CERTIFIED MAIL #70180360000052676083



2018CI23837 S00002

Case Number: 2018-CI-23837

RODOLFO CHAPA

vs.

JANE DOE ETAL

(Note: Attached document may contain additional litigants).

IN THE DISTRICT COURT
57th JUDICIAL DISTRICT
BEXAR COUNTY, TEXAS

CITATION

"THE STATE OF TEXAS"

DIRECTED TO: WAL-MART STORES INC

BY SERVING ITS REGISTERED AGENT, CT CORPORATION SYSTEM
124 WEST CAPITOL AVENUE 1900
LITTLE ROCK AR 72201

"You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this CITATION and ORIGINAL PETITION a default judgment may be taken against you." Said CITATION with ORIGINAL PETITION was filed on the 20th day of December, 2018.

ISSUED UNDER MY HAND AND SEAL OF SAID COURT ON THIS 26TH DAY OF December A.D., 2018.

SHAWN C BROWN
ATTORNEY FOR PLAINTIFF
540 S SAINT MARYS ST
SAN ANTONIO, TX 78205-3418



Donna Kay McKinney
Bexar County District Clerk
101 W. Nueva, Suite 217
San Antonio, Texas 78205

By: *Martha Medellin*, Deputy

RODOLFO CHAPA
vs
JANE DOE ETAL

Officer's Return

Case Number: 2018-CI-23837
Court: 57th Judicial District Court

Came to hand on the 26th day of December 2018, A.D., at 1:20 o'clock P.M. and EXECUTED (NOT EXECUTED) by CERTIFIED MAIL, on the _____ day of _____ 20____, by delivering to: _____ at 124 WEST CAPITOL AVENUE 1900 LITTLE ROCK AR 72201 a true copy of this Citation, upon which I endorse that date of delivery, together with the accompanying copy of the CITATION with ORIGINAL PETITION

Cause of failure to execute this Citation is _____

Donna Kay McKinney
Clerk of the District Courts of
Bexar County, TX
By: *Martha Medellin*, Deputy

EXHIBIT “C”

FILED
 1/25/2019 4:17 PM
 Mary Angie Garcia
 Bexar County District Clerk
 Accepted By: Alexandra Johnson

NO.: 2018CI23837

RODOLFO CHAPA	§	IN THE DISTRICT COURT
	§	
VS.	§	57 TH JUDICIAL DISTRICT
	§	
JANE DOE AND	§	
WAL-MART STORES, INC.; WAL-	§	
MART STORES TEXAS, LP; AND	§	
WAL-MART STORES TEXAS, LLP	§	OF BEXAR COUNTY, TEXAS

**DEFENDANTS WAL-MART STORES, INC., WAL-MART STORES TEXAS, LP
 AND WAL-MART STORES TEXAS, LLP'S
ORIGINAL ANSWER TO PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Defendants, Wal-Mart Stores, Inc., Wal-Mart Stores Texas, LP and Wal-Mart Stores Texas, LLP in the above cause of action, and file this Original Answer to Plaintiff's Original Petition and for support thereof would respectfully show unto the Court as follows:

I.

Defendants assert denials, under Rule 92 of the Texas Rules of Civil Procedure, to each and every allegation contained in the said Petition, and demand strict proof thereof.

II.

Pleading further and without waiving the foregoing, Defendants assert that if Plaintiff suffered injuries as a result of the incident made the basis of this lawsuit, which Defendants expressly deny by the filing of this pleading, that said injuries were caused in whole or in part by Plaintiff's own negligence or responsibility. Accordingly, Defendants assert all rights, privileges and remedies afforded or available to them pursuant to Chapter 33 of the Texas Civil Practices and Remedies Code.

III.

Pleading further and without waiving the foregoing, Defendants assert that the incident in question was proximately caused or solely proximately caused by the negligent and/or wrongful conduct of third-parties outside the control of these Defendants.

IV.

Pleading further and without waiving the foregoing, Defendants assert that any damages allegedly suffered by Plaintiff as a result of the incident made the basis of this lawsuit, which Defendants expressly deny by the filing of this pleading, were exacerbated by Plaintiff's failure to mitigate said damages. Accordingly, Defendants assert all rights, privileges and remedies afforded or available to them pursuant to the Texas Civil Practices and Remedies Code.

V.

Pleading further and without waiving the foregoing, Defendants specifically reserve the right to amend this Answer, as is their right under the Texas Rules of Civil Procedure.

PREMISES CONSIDERED, Defendants pray that Plaintiff take nothing by this lawsuit, and that Defendants be allowed to go hence without day and recover all of their costs and attorney's fees, and such other and further relief, both special and general, at law or in equity, to which they may show themselves justly entitled.

Respectfully submitted,

DAW & RAY
A LIMITED LIABILITY PARTNERSHIP

/s/ Willie Ben Daw, III

Willie Ben Daw, III; TBN: 05594050

Email: wbdaw@dawray.com

James K. Floyd; TBN: 24047626

Email: jfloyd@dawray.com

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San Antonio, Texas 78232

(210) 224-3121 Telephone

(210) 224-3188 Facsimile

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the above and foregoing instrument has been served upon all known counsel of record by Electronic Service on the 25th day of January, 2019.

Raul B. Rodriguez
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Shawn C. Brown
LAW OFFICE OF SHAWN C. BROWN
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San Antonio, Texas 78205

Email: shawn@shawnbrownlaw.com

/s/ Willie Ben Daw, III
Willie Ben Daw, III

EXHIBIT “D”

FILED
 1/25/2019 4:17 PM
 Mary Angie Garcia
 Bexar County District Clerk
 Accepted By: Alexandra Johnson

NO.: 2018CI23837

RODOLFO CHAPA	§	IN THE DISTRICT COURT
	§	
VS.	§	57 TH JUDICIAL DISTRICT
	§	
JANE DOE AND	§	
WAL-MART STORES, INC.; WAL-	§	
MART STORES TEXAS, LP; AND	§	
WAL-MART STORES TEXAS, LLP	§	OF BEXAR COUNTY, TEXAS

**DEFENDANTS WAL-MART STORES, INC., WAL-MART STORES TEXAS, LP AND
 WAL-MART STORES TEXAS, LLP'S DEMAND FOR JURY TRIAL**

COME NOW, Defendants Walmart Inc. and Wal-Mart Stores Texas, LLC and hereby demand a jury trial as is their right under Tex. Const. Art. I, § 15. Such demand for jury trial is hereby made more than 30 days before the date this case is set for trial in accordance with Tex. R. Civ. P. 216. Defendants tender the jury fee contemporaneously with the filing of this jury demand which they may show themselves justly entitled.

Respectfully submitted,

DAW & RAY
 A LIMITED LIABILITY PARTNERSHIP

/s/ Willie Ben Daw, III
 Willie Ben Daw, III; TBN: 05594050
 Email: wbdaw@dawray.com
 James K. Floyd; TBN: 24047626
 Email: jfloyd@dawray.com
 14100 San Pedro Ave., Suite 302
 San Antonio, Texas 78232
 (210) 224-3121 Telephone
 (210) 224-3188 Facsimile

ATTORNEYS FOR DEFENDANTS

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Raul B. Rodriguez
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540 S. St. Mary's Street
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Email: shawn@shawnbrownlaw.com

/s/ Willie Ben Daw, III
Willie Ben Daw, III

EXHIBIT “E”

NO.: 2018CI23837

RODOLFO CHAPA	§	IN THE DISTRICT COURT
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JANE DOE AND	§	
WAL-MART STORES, INC.; WAL-	§	
MART STORES TEXAS, LP; AND	§	
WAL-MART STORES TEXAS, LLP	§	OF BEXAR COUNTY, TEXAS

NOTICE OF FILING OF REMOVAL TO FEDERAL COURT

Please take notice that a Notice of Removal in this action was electronically filed in the United States District Court for the Western District of Texas, San Antonio Division on _____. A copy of said Notice of Removal is attached to this Notice and is served and filed herewith.

Respectfully submitted,

DAW & RAY, LLP

/s/ Willie Ben Daw, III

Willie Ben Daw, III; TBN: 05594050

Email: wbdaw@dawray.com

James K. Floyd; TBN: 24047626

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(210) 224-3121 Telephone

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the above and foregoing instrument has been served upon all known counsel of record by Electronic Service on the 3rd day of January, 2019.

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Shawn C. Brown
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San Antonio, Texas 78205

Email: shawn@shawnbrownlaw.com

/s/ Willie Ben Daw, III
Willie Ben Daw, III

EXHIBIT “F”

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

RODOLFO CHAPA

VS.

JANE DOE AND
WAL-MART STORES, INC.; WAL-
MART STORES TEXAS, LP; AND
WAL-MART STORES TEXAS, LLP

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C.A. NO. _____

JURY DEMANDED

LIST OF COUNSEL OF RECORD

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LAW OFFICE OF SHAWN C. BROWN
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San Antonio, Texas 78205
(210) 224-8200
Fax: (210) 224-8214

ATTORNEYS FOR PLAINTIFF, RODOLFO CHAPA

2. Willie Ben Daw, III; SBN: 05594050
Email: wbdaw@dawray.com
James K. Floyd; SBN: 24047626
Email: jfloyd@dawray.com
14100 San Pedro Ave., Suite 302
San Antonio, Texas 78232
(210) 224-3121 Telephone
(210) 224-3188 Facsimile

***ATTORNEYS FOR DEFENDANTS, WAL-MART STORES, INC., WAL-MART STORES
TEXAS, LP AND WAL-MART STORES TEXAS, LLP***



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Houston • San Antonio • McAllen

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